

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MACHELLE JOSEPH,)	
Plaintiff)	1:19-CV-03347-TCB
v.)	
BOARD OF REGENTS OF THE)	
UNIVERSITY SYSTEM OF)	
GEORGIA; GEORGIA TECH)	
ATHLETIC ASSOCIATION;)	
GEORGE PETERSON, in his)	
individual capacity; TODD)	
STANSBURY, in his individual)	
capacity; MARVIN LEWIS, in)	
his individual capacity; and)	
SHOSHANNA ENGEL, in her)	
individual capacity)	
Defendant)	
)	

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND THE PAGE LIMIT
FOR RESPONSE TO DEFENDANTS’ MOTIONS TO DISMISS**

Pursuant to L.R. 7.1(D), N.D. Ga., Plaintiff MaChelle Joseph makes and files this Unopposed Motion to Extend the Page Limit for her Response to Defendants’ Motions to Dismiss. Plaintiff requests a fifteen (15) page extension of the page limit for her Response. In support of this Motion, Plaintiff shows the Court as follows:

1.

The deadline for Plaintiff to file her Response in Opposition to Defendants' Motions to Dismiss is October 24, 2019.

2.

This case involves multiple defendants, with multiple claims of sex discrimination and retaliation in violation of the Education Amendments Act of 1972, 20 U.S.C. §§1681 et seq. ("Title IX"); sex discrimination in violation of 42 U.S.C. § 1983 and the Equal Protection Clause; unlawful retaliation in violation of the Georgia Whistleblower Act, O.C.G.A. § 45-1-4 ("GWA"); breach of contract under Georgia law; and a claim for expense of litigation under O.C.G.A. § 13-6-11.

3.

On September 26, 2019, Defendants filed three separate Motions to Dismiss and supporting briefs totaling 57 pages not including exhibits, seeking to dismiss all counts in Plaintiff's Complaint. Dkt. 18, 19, 20. In the interest of efficiency, Plaintiff intends to file one consolidated Response to all three Motions.

4.

In order to respond adequately to Defendants' arguments on each of Plaintiff's causes of action, as well as provide the Court a factual account of

each claim, Plaintiff anticipates that she may need an additional fifteen (15) pages beyond the twenty-five (25) page limit, for a total not to exceed forty (40) pages.

5.

On October 18, 2019, counsel for Plaintiff contacted Defendants' counsel seeking their position on an extension of the page limit for Plaintiff's response brief to up to forty (40) pages total. Defendants' counsel has stated they have no opposition to the request.

6.

Counsel for Plaintiff represents that they will make every effort to file the shortest brief possible, while still providing the Court with sufficient information to render an informed decision on each of Plaintiff's claims.

7.

This request for page extension is made in good faith and will not prejudice either party.

WHEREFORE, Plaintiff respectfully requests that the Court grant her Motion and extend the page limit for Plaintiff's Response in Opposition to Defendants' Motions to Dismiss by fifteen (15) pages, for a total of forty

(40) pages. For the Court's convenience, a proposed Order granting this Motion is attached.

Respectfully submitted this 18th day of October, 2019.

/s/Edward D. Buckley

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